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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	
)	Chapter 11
ENDO INTERNATIONAL plc, <i>et al.</i> ,)	
)	Case No. 22-22549 (JLG)
Debtors. ¹)	(Joint Administration Pending)
)	

**VERIFIED STATEMENT OF THE AD HOC COMMITTEE OF NAS CHILDREN
PURSUANT TO BANKRUPTCY RULE 2019**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), The Ad Hoc Committee of NAS Children (the “NAS Committee”) holding general unsecured claims in the above-captioned chapter 11 cases (the “Chapter 11 Cases”), by and through its undersigned counsel, submits this verified statement pursuant to Fed. R. Bankr. P. 2019 (the “Verified Statement”) and, in support thereof, states as follows:

¹ The last four digits of Debtor Endo International plc's tax identification number are 3755. Due to the large number of debtors in these chapter 11 cases, a complete list of the debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://restructuring.primeclerk.com/endo>. The location of the Debtors' service address for purposes of these chapter 11 cases is: 1400 Atwater Drive, Malvern, PA 19355.

1. The NAS Committee is comprised of parents and guardians advocating on behalf of children born with Neonatal Abstinence Syndrome.² The NAS Committee has appeared in other bankruptcy cases involving claims pertaining to the opioid crisis, including *In re Purdue Pharma LP, et al.*, Case No. 19-23649 (S.D.N.Y.), *In re Mallinckrodt*, Case No. 20-12522 (Delaware) and *In re Insys Therapeutics, Inc.*, Case No. 19-11292 (Delaware).

2. After the commencement of these Chapter 11 Cases, on or about August 17, 2022, the NAS Committee determined that it would monitor and take positions, as necessary, in these cases, and, thereafter, retained local counsel, Tarter Krinsky & Drogin LLP (“TKD”), to represent the NAS Committee in the Chapter 11 Cases.

3. In accordance with Bankruptcy Rule 2019, attached hereto as Exhibit A are the initials of each member of the NAS Committee. The NAS Committee believes that no further disclosure is required in order to protect the confidentiality and privacy of its members. The information set forth in Exhibit A is based on information provided by the applicable members of the NAS Committee or their counsel to TKD, and is intended only to comply with Bankruptcy Rule 2019 and it is not intended for any other purpose. TKD does not make any representation regarding the validity, amount, allowance, or priority of such claims and reserves all rights with respect thereto.

4. Nothing contained in this Verified Statement (or Exhibit A) should be construed as a limitation upon, or waiver of, any rights of any member of the NAS Committee to assert, file

² NAS is a medical diagnosis arising from both testing and observations of a variety of conditions associated with opioid use and its sudden withdrawal, commonly known as neonatal opioid withdrawal syndrome (NOWS).

and/or amend their claims in accordance with applicable law and any orders entered in the chapter 11 cases.³

5. The NAS Committee reserves the right to amend and/or supplement this Verified Statement in accordance with Bankruptcy Rule 2019.

Dated: August 29, 2022
New York, New York

TARTER KRINSKY & DROGIN LLP
Counsel for Ad Hoc Committee of NAS Children

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³ Including, but not limited to, the right to file a class proof of claim on behalf of all members of the NAS Committee.

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